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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, CHAIRMAN  
PAUL NEWMAN  
BRENDA BURNS  
BOB STUMP  
SANDRA D. KENNEDY

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AZ CORP COMMISSION  
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IN THE MATTER OF THE APPLICATION  
OF MOHAVE ELECTRIC COOPERATIVE,  
INC. FOR APPROVAL OF A WASTE-TO-  
ENERGY FACILITY AS A PILOT  
PROGRAM UNDER THE RENEWABLE  
ENERGY RULES OR, IN THE  
ALTERNATIVE, FOR A LIMITED  
WAIVER

DOCKET NO. E-01750A-10-0453

NOTICE OF FILING TESTIMONY  
SUMMARIES

Mohave Electric Cooperative, Inc. ("MEC"), by and through undersigned  
counsel, hereby files the Testimony Summary of Ronald Blendu, Robert Estes, J. Tyler  
Carlson, Professor Castaldi and Professor Themelis in the above-referenced matter as required  
in the procedural order dated September 13, 2011.

DATED this 23<sup>rd</sup> day of November, 2011.

CURTIS, GOODWIN, SULLIVAN,  
UDALL & SCHWAB, P.L.C.

Arizona Corporation Commission

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VIR

By:

William P. Sullivan

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Phoenix, Arizona 85012-3205

Attorneys for Mohave Electric Cooperative,  
Inc.

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Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

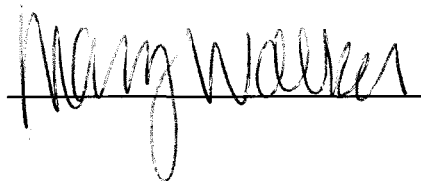
Copies of the foregoing emailed  
this 7<sup>th</sup> day of November, 2011 to:

Amanda Ho  
aho@azcc.gov

1 Copy of the foregoing mailed  
2 this 22<sup>nd</sup> day of November, 2011 to:

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1                                   **MOHAVE ELECTRIC COOPERATIVE, INCORPORATED**  
2                                   **(DOCKET NO. E-01750A-10-0453)**  
3                                   **SUMMARY OF TESTIMONY OF**  
4                                   **RONALD D. BLENDU**

5                   Ronald D. Blendu's testimony, taken as a whole, supports the Commission Decision  
6                   No. 72500 and the Commission should affirm its Decision.

7                   Mr. Blendu has over 35 years' experience in power plant operation, design,  
8                   construction, development and start-up. He holds a B.S. in Engineering.

9                   Mr. Blendu explains that:

- 10                   • Resource Power Group, LLC ("RPG") will be only the second company in the  
11                   U.S. to use bubbling bed technology for refuse derived fuel ("RDF");
- 12                   • the Commission properly designated the RPG W-T-E facility a pilot program  
13                   under A.A.C. R14-2-1802.D;
- 14                   • a waiver under A.A.C. R14-2-1816 is also a viable alternative to classify the  
15                   energy produced by the RPG W-T-E facility eligible for renewable credits.

16                   Mr. Blendu discusses the testimony presented by the Grand Canyon Chapter of the  
17                   Sierra Club and explains that:

- 18                   • Municipal Solid Waste ("MSW") is a renewable energy resource;
- 19                   • the RPG W-T-E will enhance curbside recycling by removing recyclable  
20                   material that would otherwise be placed in landfills;
- 21                   • the Sierra Club's air quality and other pollution concerns are overstated, based  
22                   upon outdated data, and ignore the regulatory constraints applicable to the RPG  
23                   W-T-E facility.

1 **MOHAVE ELECTRIC COOPERATIVE, INCORPORATED**  
2 **(DOCKET NO. E-01750A-10-0453)**  
3 **SUMMARY OF TESTIMONY OF**  
4 **ROBERT ESTES**

5 Mr. Robert Estes' testimony demonstrates that any legitimate air quality concerns  
6 relating to the operation of RPG's proposed W-T-E, there will a full and fair opportunity to  
7 raise them and to have them addressed through the permitting process. Mr. Estes is a  
8 Principal Environmental Scientist with URS Corporation.

9 URS was engaged by Reclamation Power Group in 2008 to assist it in the air quality  
10 permitting process associated with the municipal waste to energy facility proposed by RPG.  
11 URS also analyzed 17,900 pounds of City of Glendale residential trash of which 15,300  
12 pounds were actually sorted so an outside laboratory could analyze the segregated trash.

13 Mr. Estes explains the significant air quality and pollution control requirements  
14 applicable to the W-T-E facility proposed by RPG and the post permitting compliance  
15 requirements.

16 He concludes that the permitting and compliance requirements applicable to RPG's  
17 proposed W-T-E facility are significant and are designed to ensure the permit and pollution  
18 control requirements are not only installed, but maintained during the facility's operation.  
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1                   **MOHAVE ELECTRIC COOPERATIVE, INCORPORATED**  
2                   **(DOCKET NO. E-01750A-10-0453)**  
3                   **SUMMARY OF TESTIMONY OF**  
4                   **PROFESSOR THEMELIS & PROFESSOR CASTALDI**

5           Professor Nickolas J. Themelis, and Professor Marco J. Castaldi, strongly recommend  
6           that the Arizona Corporation Commission takes whatever steps are in their power to facilitate  
7           the introduction of WTE renewable energy source in Arizona. They are the Director and  
8           Associate Director of the Earth Engineering Center and Department of Earth and  
9           Environmental Engineering at Columbia University. They jointly author this testimony  
10          providing basic background on waste to energy ("WTE") and its role in sustainable energy  
11          and waste management. They explain that WTE is compatible with recycling, is superior to  
12          landfilling and, after adopting *Maximum Achievable Control Technology (MACT) rules of*  
13          *EPA*, no longer present air quality and health issues as contended by the Grand Canyon  
14          Chapter of the Sierra Club's witnesses.

1                                   **MOHAVE ELECTRIC COOPERATIVE, INCORPORATED**  
2                                   **(DOCKET NO. E-01750A-10-0453)**  
3                                   **SUMMARY OF TESTIMONY OF**  
4                                   **TYLER CARLSON**

5           J. Tyler Carlson is the Chief Executive Officer of Mohave Electric Cooperative,  
6 Incorporated ("Mohave") and is testifying at the request of Commissioner Newman. Mr.  
7 Carlson will be sponsoring the pre-filed rebuttal testimony of Michael A. Curtis supporting  
8 Commission Decision No. 72500 and recommending the Decision be affirmed. He explains  
9 that Mohave, on behalf of its member-owners:

- 10           • Is committed to securing renewable energy resources for its renewable energy  
11           portfolio that are competitively priced and meet Mohave's load profiles;
- 12           • Continues to consider all forms of renewable resources for its renewable energy  
13           portfolio, including the energy and renewable energy credits ("RECs")  
14           produced by the Reclamation Power Group's ("RPG") waste to energy  
15           ("WTE") facility;
- 16           • Has not included the energy or renewable energy credits from the RPG WTE  
17           facility in its REST portfolio and that any such inclusion is subject to later  
18           Commission review and approval;
- 19           • Will not apply RECs from the RPG WTE facility to satisfy its distributive  
20           generation requirement;
- 21           • Is not offering RPG any preconstruction or construction incentive in connection  
22           with the WTE facility;
- 23           • Believes a municipal solid waste (MSW) represents a renewable energy  
24           resource and that using it for energy is a viable alternative to placing it in  
25           landfills;
- Requests the Commission designate the RPG WTE facility a pilot pursuant to  
          A.A.C. R14-2-1802.D and/or grant it a waiver under A.A.C. R14-2-1816 such  
          that the energy it produces is eligible for RECs.